



**CONTRA COSTA  
WATER DISTRICT**

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6/19/07 BdMtg Item 10  
**WR Enforcement**  
Deadline: 6/6/07 Noon

June 6, 2007

**Directors**

Joseph L. Campbell  
*President*

Elizabeth R. Anello  
*Vice President*

Bette Boatman  
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Karl L. Wandry

Walter J. Bishop  
*General Manager*

Song Her, Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**Subject: Initial Comments from CCWD for the June 19, 2007  
Water Right Enforcement Workshop**

To the Members of the State Water Resources Control Board:

Contra Costa Water District (CCWD) appreciates this opportunity to make a practical and constructive suggestion related to water right enforcement while the State Water Resources Control Board (Board) considers potential changes to its policy.

CCWD believes that the Board, in conjunction with the policy and enforcement priorities that it establishes, should require enhanced reporting of water diversions and use by all permittees and licensees. Such reporting should be included as a condition of use in all pending and future applications approved by the Board.

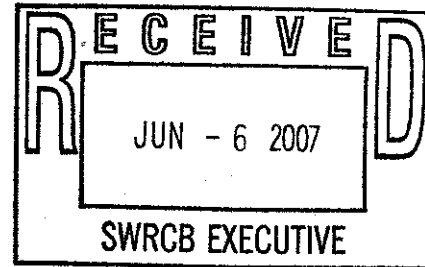
In the current system, enforcement of water rights seniority is complicated by a number of issues, including the lack of accurate and timely information about actual diversions. As development continues, and additional appropriative permits are approved, the lack of adequate data for seniority enforcement will become a central issue.

Improved accounting, tracking, and reporting of diversions is necessary. Since staff and other resources of the Board are increasingly strained, placing the additional reporting burdens on water rights holders would be a practical alternative. The reporting could be done at nominal expense and would provide valuable data for a variety of Board-related purposes, for other uses by the State of California, and to all water users. This value could be created with minimum effort by the Board.

The following recommendations are practical first steps for tracking seniority of use and enabling an efficient enforcement policy while taking advantage of the technological advances of the last 30 years:

- **Daily Diversion Data**

Require all new and pending appropriative water right permittees and licensees to report daily diversion information on a monthly or weekly basis. The data should be posted to a publicly accessible web site. Later, the Board, or another agency



such as the Department of Water Resources, could develop an automated system (e.g., a web-based query/retrieval system) to process and allow access to this information for general use.

- GIS conversion

Include the diversion data in the water rights geographic information system (GIS), to allow the Board and the public to quickly query the records and determine, for instance, what junior appropriators have diversions upstream of a group of senior appropriators. Again, this data would be valuable enough that other agencies or parties could assist the Board with this task.

If you have any questions, please call me at (925) 688-8073.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Briggs".

for  
David A. Briggs  
Water Resources Manager

DAB/DS:wec